

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
AT MARSHALL

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TX EASTERN-MARSHALL

Lin Packaging Technologies, Ltd., ) BY  
) NO. 2 - 05 C V - 540 LED  
Plaintiff, )  
vs. )  
Samsung Electronics Co., Ltd; Samsung )  
Electronics America, Ltd.; Samsung )  
Semiconductor, Inc; Samsung Austin )  
Semiconductor, L.P.; Hynix Semiconductor, )  
Inc.; Hynix Semiconductor America, Inc.; and )  
Hynix Semiconductor Manufacturing )  
America, Inc., )  
Defendants. )

Plaintiff Lin Packaging Technologies, Ltd., brings this Complaint against Defendants Samsung Electronics Co., Ltd, Samsung Electronics America, Ltd., Samsung Semiconductor, Inc, Samsung Austin Semiconductor, L.P., Hynix Semiconductor, Inc., Hynix Semiconductor America, Inc., and Hynix Semiconductor Manufacturing America, Inc., and with knowledge as to itself and on information and belief in all other respects, would show as follows:

I. PARTIES

1. Plaintiff Lin Packaging Technologies, Ltd., is a Texas corporation with its principal place of business at 505 E. Travis Street Suite 112C Marshall, TX 75670.
2. Defendant Samsung Electronics Co., Ltd., is a corporation organized and existing under the laws of Korea, with a principal place of business at 250, 2-ka, Taepyung-ro, Chung-Ku, Seoul, South Korea, 100-742.

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3. Defendant Samsung Electronics America, Inc., is a wholly owned subsidiary of Samsung Electronics Co., Ltd., with its principal place of business at 105 Challenger Road, Ridgefield Park, NJ 07660.

4. Defendant Samsung Semiconductor, Inc., is a wholly owned subsidiary of Samsung Electronics Co., Ltd., with its principal place of business at 3655 North First Street, San Jose, CA. 95134.

5. Defendant Samsung Austin Semiconductor, L.P., is a limited partnership owned by Samsung Electronics Co., Ltd., with its principal place of business at 12100 Samsung Boulevard, Austin, TX 78754.

6. Defendant Hynix Semiconductor, Inc., is a corporation organized and existing under the laws of Korea, with its headquarters located at San 136-1, Ami-Ri Bubal-eub Inchon-si Kyoungki-do, Korea 467-860.

7. Defendant Hynix Semiconductor America, Inc., a wholly-owned subsidiary of Hynix Semiconductor, Inc., is a corporation organized and existing under the laws of Delaware, with its principal place of business located at 3101 North First Street, San Jose, California 95134.

8. Defendant Hynix Semiconductor Manufacturing America, Inc., is a California corporation, having its principal place of business at 1830 Willow Creek Circle, Eugene, Oregon 97402.

## **II. JURISDICTION**

9. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*, including 35 U.S.C. § 271. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

## **III. COMPLAINT FOR PATENT INFRINGEMENT**

10. Plaintiff is the assignee of U.S. Patent No. 6,249,052 (the “052 Patent”), issued June 19, 2001, entitled “Substrate on Chip (SOC) Multiple Chip Module (MCM) with Chip-

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Size-Package (CSP) Ready Configuration"; and 6,002,178 (the "178 Patent"), issued December 14, 1999, entitled "Multiple Chip Module Configuration to Simplify Testing Process and Reuse of Known-Good Chip-Size Package (CSP)" (collectively, the "Patents in Suit").

11. Defendants have infringed, contributed to the infringement of, and/or actively induced others to infringe, the Patents in Suit, and continue to do so.

**IV. JURY DEMAND**

12. Plaintiff demands a trial by jury on all issues.

**V. PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays:

(a) That this Court find that Defendants have committed acts of patent infringement in violation of the Patent Act, 35 U.S.C. § 271;

(b) That this Court enter judgment that:

(i) Plaintiff is the owner of the Patents in Suit and all rights of recovery thereunder;

(ii) the Patents in Suit are valid and enforceable; and

(iii) Defendants have willfully infringed the Patents in Suit;

(c) That this Court enter an injunction enjoining Defendants, their officers, agents, servants, employees, and attorneys, and any other person in active concert or participation with them, from continuing the acts herein complained of, and more particularly, that Defendants and such other persons be permanently enjoined and restrained from further infringing the Patents in Suit;

(d) That this Court require Defendants to file with this Court, within thirty (30) days after the entry of final judgment, a written statement under oath setting forth in detail the manner in which Defendants have complied with the injunction;

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- (e) That the Court award Plaintiff the damages to which it is entitled due to Defendants' patent infringement with both pre-judgment and post-judgment interest;
- (f) That Defendants' infringement of the Patents in Suit be judged willful and that the damages to Plaintiff be increased pursuant to 35 U.S.C. § 284 by three times the amount found or assessed;
- (g) That this be judged an exceptional case and Plaintiff be awarded its attorneys' fees in this action pursuant to 35 U.S.C. § 285;
- (h) That this Court award Plaintiff its costs and disbursements in this action, including reasonable attorneys' fees;
- (i) That this Court grant Plaintiff all further relief to which it shall be entitled.

Respectfully submitted,

SUSMAN GODFREY LLP

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